
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Honorable Joseph A. Dickson
v. : Mag. No. 16-6587 (JAD)
VEERABHADRARAO KUNAM : **CRIMINAL COMPLAINT**

I, Keith Watkins, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 30, 2016, in the District of New Jersey and elsewhere, defendant Veerabhadrarao Kunam:

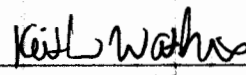
in the special aircraft jurisdiction of the United States, did knowingly and intentionally engage in sexual contact, within the meaning of Title 18, United States Code, Section 2246(3), with another person without that person's permission,

in violation of Title 18, United States Code, Section 2244(b) and Title 49, United States Code, Section 46506.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT A

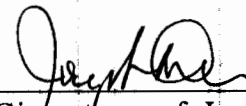
continued on the attached page and made a part hereof.



Keith Watkins, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
August 1, 2016 at Newark, New Jersey

THE HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

I, Keith Watkins, a Special Agent with the Federal Bureau of Investigation ("FBI"), having conducted an investigation and having spoken with other individuals, have knowledge of the following facts. All statements included herein are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. All times set forth herein are approximate. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

1. On or about July 29, 2016, defendant Veerabhadrarao Kunam ("Kunam") was a male passenger aboard Virgin America Flight 170 (the "Flight"), which had departed from Los Angeles International Airport in Los Angeles, California at approximately 11:35 p.m. Pacific Daylight Time. After traveling overnight, the Flight was scheduled to arrive at Newark Liberty International Airport on July 30, 2016 at approximately 7:50 a.m. Eastern Daylight Time.

2. Defendant Kunam was seated in or around Seat 25D (an aisle seat) next to a female passenger (the "Victim"), who was seated in or around Seat 25E (a middle seat). The Victim was traveling with a friend ("Witness 1") who was seated in or around Seat 25F, (a window seat). All three persons were in the same row. The Victim and Witness 1 did not know the Defendant.

3. At some point during the Flight, the Victim fell asleep. Sometime thereafter, and while the aircraft was still in flight over the United States, the Victim awoke to find Defendant Kunam's hands massaging her vagina and buttocks over her pants. Defendant Kunam was also rubbing his bare feet against the Victim's bare feet.

4. Upon noticing Defendant Kunam's hands touching her, the Victim alerted Witness 1 who also saw Defendant Kunam's hands on the Victim's vagina and buttocks. Witness 1 traded seats with the Victim and confronted Defendant Kunam. Defendant Kunam told Witness 1, in sum and substance, that he wanted everyone to forget about the incident and offered to buy Witness 1 a drink for any trouble he may have caused. Witness 1 declined the Defendant's offer and alerted a flight crew member about what had occurred.

5. A member of the flight crew instructed Defendant Kunam to move to Seat 25A, which was empty, and informed Defendant Kunam that he could not return to Seat 25D because of what had occurred. Defendant Kunam told the flight crew member that he would not touch the Victim again.